

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 4

61 Forsyth Street, S.W.
Atlanta, Georgia 30303

MEMORANDUM

April 24, 2014

SUBJECT: Review of Removal Site Evaluation report
Francis St. (Seven Out Tank Site), Waycross, GA

FROM: Kevin Koporec, Toxicologist
Technical Support Section
Superfund Support Branch

KPK

THROUGH: Glenn Adams, Chief
Technical Support Section
Superfund Support Branch

GA

TO: Matthew Huyser, OSC
Emergency Response & Removal Branch

Per your request, I have reviewed the **draft Removal Site Evaluation Report** for the **Francis Street (Seven Out Tank site), Waycross, Ware County, Georgia**. My review focuses on the human health risk aspects of the report.

Section 1.2.2.2, pg 7 – Discussion of Comparison values. For the paragraph above Table 3, I recommend adding the following text at the beginning of the paragraph.

“It should be noted that PRGs (e.g., RSLs) are used to narrow down the list of detected chemicals that need further evaluation for health risk which then is used to help determine the need for remedial action. For EPA Removal sites, comparison with RMLs serve to complete this further evaluation step.”

Section 2.2.2 - Results From Soil Samples... text following Table 6: “Benzo(a)pyrene...EPA generic RML for Residential Soils (2.1 mg/kg)...”

The current residential soil RML for Benzo(a)pyrene is 1.5 mg/kg. (EPA 2012)

Section 2.2.3, pg 18 – Results from Sediment Samples. For the paragraph following Table 7, I recommend adding the following text at the end of the paragraph.

“Since RMLs are not exceeded, the reported levels are all below or within the EPA target cancer risk range based on residential soil (i.e., unrestricted use).”

This comment applies to discussion of other sample data in this report as well.



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Sections 2.2.2.3, 2.2.3.3, 2.2.4.5 – EPA Recommendations for surface soil, sediment. I concur with the “No Action” recommendations based on no exceedances of scenario-specific RMLs in the current analytical data.

References:

EPA 2012. Regional Removal Management Levels for Chemicals
[<http://www.epa.gov/region04/superfund/programs/riskassess/rml/rml.html>], updated December 2012.

Feel free to contact me if you need further assistance on risk assessment issues.